

# EXHIBIT F

to Second Arin Declaration in Support of Plaintiff Federal Trade Commission's Motion for  
Entry of Protective Order

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**FEDERAL TRADE COMMISSION,**

**Plaintiff,**

**v.**

**U.S. ANESTHESIA PARTNERS, INC., et al.**

**Defendants.**

**Case No.: 4:23-CV-03560-KH**

**DEFENDANT U.S. ANESTHESIA PARTNERS, INC.'S INITIAL DISCLOSURES  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant U.S. Anesthesia Partners, Inc. (“USAP”) hereby submits its first initial disclosures. The following disclosures are based on information reasonably available and currently known to USAP. This litigation is at the earliest stage, and USAP is without the benefit of the investigative files, materials pertaining to witnesses, and other information or documents obtained by the Federal Trade Commission (“FTC”) at this point in the case. USAP expressly reserves the right to correct, modify, and/or supplement these disclosures in accordance with Federal Rule of Civil Procedure 26(e)(1)(A), and reserves all objections relative to the use, for any purpose, of these disclosures or of any information or document referenced herein. By identifying individuals as part of these disclosures, USAP makes no representations, concessions, or admissions, regarding the relevant knowledge or competence to testify of any of those individuals, and reserves the right to object on any grounds, to any deposition or testimony of any such individuals.

USAP reserves the right to rely upon any of the individuals or entities identified for subjects other than those listed. In addition, all of these disclosures are made without prejudice

to producing, or disclosing, during discovery or at any point before trial, any additional documents, data, information, or witnesses, subsequently determined or discovered to have been omitted from these disclosures.

USAP reserves the right to make objections to the production and admissibility of any documents or tangible things, or the answering of interrogatories regarding any matters discussed herein. USAP also reserves the right to move for a protective order pursuant to Federal Rule of Civil Procedure 26 before producing or allowing any discovery of the matters stated herein. USAP does not waive the attorney-client privilege, the attorney-work product doctrine, or any other available privilege, doctrine, or immunity from discovery.

Finally, in making these disclosures, USAP does not waive its position that the FTC lacks the statutory authority both to seek injunctive relief independent from an administrative proceeding and to challenge USAP's past conduct; that each of the FTC's antitrust claims or allegations fail to state a claim as a matter of law and should be dismissed with prejudice; its position that the FTC has failed to appropriately define any relevant market or USAP's role in any such markets; or its position that the FTC has failed to allege any actionable price-fixing or market-allocation agreement.

**I. Rule 26(a)(1)(A)(i): *the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment***

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i) and subject to the qualifications stated above, USAP identifies the individuals and third parties listed in Exhibits A and C attached hereto as likely to have discoverable information that USAP may use to support its claims or defenses, excluding persons to be used solely for impeachment. USAP reserves the right to rely upon information derived from additional persons as such individuals come to

USAP's attention through further discovery and investigation, to rely upon evidence obtained from any persons identified by the FTC, and to rely upon evidence obtained from the individuals and third parties listed in Exhibits A and C with respect to any subject. As discovery is ongoing, and USAP has not yet issued document requests, and USAP does not yet have the benefit of any investigative files, information, or other materials from the FTC, USAP reserves the right to supplement Exhibits A and C to the extent necessary to identify additional current or former employees, current or former FTC personnel, or third parties that may possess information relevant to USAP's defenses or the allegations by the FTC.

**II. Rule 26(a)(1)(A)(ii): *a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment***

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii) and subject to the qualifications stated above, USAP identifies in Exhibit B hereto those categories of documents, data compilations, and tangible things in its possession, custody, or control that it may use to support its claims or defenses in this action, unless such use is solely for impeachment. USAP makes these disclosures without waiving any arguments it may have concerning the relevance or admissibility of, or the proper weight to be accorded to, any of the information contained in the documents described. As discovery is ongoing, and USAP has not yet issued document requests, USAP reserves the right to supplement Exhibit B to the extent necessary to identify additional categories of documents that may relate to information relevant to USAP's defenses.

**III. Rule 26(a)(1)(A)(iii): *a computation of each category of damages claimed by the disclosing party***

USAP is not seeking monetary damages at this time. USAP reserves the right to supplement, modify, or amend this disclosure as the action proceeds.

**IV. Rule 26(a)(1)(A)(iv): *any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment***

As applicable to the remedies currently pled in the operative Complaint, USAP has not identified an insurance agreement under which an entity carrying on an insurance business may be liable to indemnify or reimburse for payments made to satisfy any judgment entered in this action.

Dated: May 13, 2024

/s/ Geoffrey Klineberg

Geoffrey Klineberg

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(Federal I.D. No. 16605)  
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*Counsel for Defendant U.S. Anesthesia Partners, Inc.*

**Exhibit A**

<b>Name</b>	<b>Position</b>	<b>Contact Information</b>	<b>Subject(s)</b>
Blaylock, David	Vice Chairman, USAP-Texas (North) Clinical Governance Board	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits
Bratberg, Kristen	Former Chief Executive Officer; Former Member, USAP Board of Directors	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; facility relationships; procompetitive benefits;
Burns, Frank	Chief Administrative Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Payor negotiations
Dennis, Kori	SVP, M&A & Portfolio Management	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; procompetitive benefits; facility relationships; payor negotiations
Dutton, Richard	Chief Quality Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Procompetitive benefits; facility relationships
Flowers, Dale	Chief Operating Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Facility relationships; procompetitive benefits
Glenesk, Alan	Former EVP, Payor Contracting	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Payor negotiations; procompetitive benefits
Grimes, James	Chief Financial Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	USAP financial performance; Texas acquisitions; facility relationships; payor negotiations
Holland, Michael	Former Chief Development Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; procompetitive benefits

<b>Name</b>	<b>Position</b>	<b>Contact Information</b>	<b>Subject(s)</b>
Holliday, Scott	Chairman, USAP Board of Directors; Chairman, USAP-Texas (North) Clinical Governance Board	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits; billing arrangements; Envision agreement
Maloney, Matthew	President of Clinical Operations	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP
McCort, Brian	EVP, Payor Relations	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Payor negotiations; procompetitive benefits
Regan, Brian	Former Member, USAP Board of Directors	Ropes & Gray, LLP	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits; Envision agreement
Schoppa, Derek	Member, USAP Board of Directors; Chairman, USAP CGB for Houston; Chairman, USAP-Texas (Gulf Coast) Clinical Governance Board; Chair, USAP Clinical Operations Committee	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits; payor negotiations
Swygert, Thomas	USAP Growth Physician Leader;	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits
Wade, Lankford	Former Chief Financial Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	USAP Financial Performance; facility relationships; payor negotiations

Name	Position	Contact Information	Subject(s)
Wright, Len	Chief Executive Officer	Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits
Commercial payors, self-funded insurance plans, anesthesia practice groups, health care facilities, and individual patients identified by the FTC as having suffered some alleged degree of injury or harm; health care facilities, anesthesiologists, and patients who benefitted from USAP's innovation and quality improvements.	Unknown	TO BE DETERMINED	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits; payor negotiations; harm.
FTC or DOJ employees or representatives in connection with any prior investigation of a USAP acquisition, or any other investigations related to alleged harms or the alleged market in Texas.	Unknown	TO BE DETERMINED	Competition to USAP; Texas acquisitions; facility relationships; procompetitive benefits; payor negotiations; harm.

### **Exhibit B**

The following documents are located at the offices of USAP; physical locations of public source(s); or at the offices of USAP's counsel. USAP notes that it has already produced hundreds of thousands of pages of documents including data responses from a variety of sources related to a number of the categories listed below or more broadly in connection with the FTC's pre-complaint investigation. This list is not intended to be exhaustive or to identify all types and categories of documents, information, and materials already produced or that will be requested from non-parties in the case. Nor is this list intended to suggest that additional discovery of USAP regarding the FTC's historical allegations would be proportional or appropriate.

- Documents and data related to competition with, or competitors to, USAP, and the geographic or product markets identified by the FTC.
- Documents and data related to each of the anesthesia practices that USAP acquired or considered acquiring.
- Documents and data related to the investigation into and clearance of USAP's prior acquisitions.
- Documents and data related to negotiations between USAP and commercial payors regarding the terms establishing USAP's participation in those payors' provider network.
- Documents and data related to USAP's advocating for, negotiation of, execution of, and performance of anesthesia services agreements with health care facilities (including those services agreements containing exclusivity agreements).
- Documents and data related to USAP's partnership and employment agreements with physician anesthesiologists and CRNAs.

- Documents and data related to USAP financial performance, forecasts, valuations, and growth strategies.
- Documents and data related to treatment outcomes for patients who receive anesthesia services from USAP physician anesthesiologists and CRNAs.
- Documents and data related to health care facilities' and patients' satisfaction with USAP's anesthesia services.

**Exhibit C**

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of ASC at West Ave	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Ascension Hospitals - Seton	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Atkins Expert Sinus Care	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baptist St. Anthony's Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baylor Heart and Vascular Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baylor Medical Center at Irving	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baylor Orthopedic and Spine Hospital at Arlington	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baylor Regional Medical Center at Grapevine	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baylor Scott & White The Heart Hospital - McKinney	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Baylor University Medical Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Bear Creek Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Blue Star Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of BSA Hospice of the Southwest	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Cardiac Cath Lab of Mid-Cities	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of CHI St. Luke's Health Memorial	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Children 1st Dental and Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Clear Fork Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Covenant Hospital Plainview	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Eclipse Surgicare	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Endo Sedation	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Envision Healthcare	TO BE DETERMINED	Documents or data related to competition to USAP and the Envision agreement
Corporate Representative or employee(s) of FortisBMI	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Galleria Periodontics and Implants	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Hays Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of HCA Houston Healthcare Tomball	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of Heaton Laser Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Hedwig ASC	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Hill Country Memorial Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Hill Country Memorial Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Houston Children's Dental Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Houston Methodist The Woodlands Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Las Colinas Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of MagForce, USA, Inc.	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Medical City Dallas Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Medical City Dallas Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Medical City Surgery Center/Fort Worth	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Memorial Hermann Specialty Hospital Kingwood	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Memorial Hermann Sugar Land Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of Memorial Hermann Surgical Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Memorial Hermann Surgical Hospital Kingwood	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Charlton	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Children's Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Health System	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Hospital Atascosa	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Hospital Hill Country	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist McKinney Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Richardson Medical Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Specialty & Transplant Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Sugarland Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Texsan Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of Methodist West Houston Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Methodist Willowbrook	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of MH Katy Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of MH Memorial Village ASC	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Mid-Cities ASC	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of OakBend Medical Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of OakBend Medical Center - Wharton	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Our Children's House	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Pearland Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Russell C. Lam, M.D.	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of South Austin Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of South Austin Surgery Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Spring Excellence Surgical Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of St. Catherine Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of St. Luke's Lakeside Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of St. Luke's Sugar Land Hospital	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Sugarland ASC-USPI/MH	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Surgery Center of Arlington	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Surgical Caregivers of Fort Worth	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Children's Hospital (OB/GYN Anesthesiology Service at the Texas Children's Pavilion for Women)	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Harris Methodist Hospital Forth Worth	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Heart & Vascular Hospital Arlington	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Heart & Vascular Hospital Arlington	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Hospital Frisco	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of Texas Health Presbyterian Hospital Dallas	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Presbyterian Hospital of Flower Mound	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Presbyterian Hospital –WNJ	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Health Surgery Center Bedford	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Texas Proton Therapy Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of TX Spine & Joint	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of UPNT Surgery	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of US Anesthetics Services, PA	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of UT Health Austin	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Wadley Regional Medical Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Westgreen Surgical Center	TO BE DETERMINED	Documents or data related to facility relationships and procompetitive benefits
Corporate Representative or employee(s) of Aetna Health Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Baylor Scott & White Insurance Company	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of Blue Cross Blue Shield of Texas	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Bright HealthCare	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Celtic Insurance Company	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Cigna HealthCare of Texas Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of CHRISTUS Health Plan	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Community First Insurance Plans	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Community Health Choice, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Friday Health Insurance Company, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Imperial Insurance Companies, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Moda Health Plan, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Molina Healthcare of Texas, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Oscar Insurance Corporation	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Scott and White Health Plan	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates

<b>Nonparty</b>	<b>Contact Info</b>	<b>Subjects</b>
Corporate Representative or employee(s) of Sendero Health Plans, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of SHA, LLC	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of Superior HealthPlan	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of UnitedHealthCare of Texas, Inc.	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates
Corporate Representative or employee(s) of US Health and Life Insurance Company	TO BE DETERMINED	Documents or data related to commercial payor negotiations and reimbursement rates

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2024 I served or caused to be served a true and correct copy of U.S. Anesthesia Partners, Inc.'s Initial Disclosures to the Federal Trade Commission upon the following counsel of record for the FTC at the email addresses listed below:

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Michael J. Arin  
Daniel W. Butrymowicz  
Timothy Grayson  
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Patrick Kennedy  
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Dated: May 13, 2024

/s/Kenneth M. Fetterman  
Kenneth M. Fetterman  
*Attorney for Defendant U.S. Anesthesia Partners,  
Inc.*